

FILED
in Clerk's Office
US District Court EDNY
March 3, 2022
Submitted via
Box.com

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

**Rec. in d prive 3/7/22*

BRAINWAVE SCIENCE, INC.,

Plaintiff,

vs.

ARSHEE, INC., DR. LAWRENCE A. FARWELL
DR. THIERRY MAISON AND BRAIN
FINGERPRINTING FOUNDATION,

Defendant

Civil Action No.: 21-cv-4402 (BMC)

INITIAL DISCLOSURES ACCORDING TO
FEDERAL RULE OF CIVIL PROCEDURE 26

TO PLAINTIFF BRAINWAVE SCIENCE AND THEIR COUNSEL OF RECORD:

DEFENDANT Dr. Thierry Maison, referred to below as the "disclosing party," hereby submits the following disclosures following Fed. R. Civ. P. 26 ("Rule 26") 2 Plaintiff's Initial Disclosures Under Fed. R. Civ. P. 26

Rule 26(a)(1)(A)(i) - The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support his or her claims or defenses unless the use would be solely for impeachment.

Name of Individual Likely to have Discoverable Information	Contact Information (Address and Telephone Number)	Subject Matter of Discoverable Information
Thierry Maison	7 Gloucester Drive Franklin, MA 02038 508-395-1069	Software development based on Microsoft Visual Studio (connected to the DevOps code repository). Notes on software project
Microsoft Cloud	Microsoft Corporation, One Microsoft Way, Redmond, WA 98052-6399.	Microsoft Azure DevOps Location of the software code. Accessible to anybody with the given permission.

INITIAL DISCLOSURES ACCORDING TO FEDERAL RULE OF CIVIL PROCEDURE 26 - 1

	At various locations around the world. Changes with time and network availability.	
CGX, LLC	8445 Camino Santa Fe, Suite 213, San Diego, CA 92121 858-864-9400	Shipment information for commercial EEG headsets relating to the subject IP from Defendants

Rule 26(a)(1)(A)(ii) - A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in his or her possession, custody, or control and may use to support his or her claims or defenses unless the use would be solely for impeachment. (Please note that the disclosing party may either produce the documents, electronically stored information, and tangible things or fill in the table below.

Description by Category of Document, Electronically Stored Information, or Tangible Thing	Description by Location of Document, Electronically Stored Information, or Tangible Thing
Software Code repository	Microsoft Azure DevOps cloud service. Accessible by the Defendant via Visual Studio
Documentation on Farwell Brain Fingerprinting software project.	7 Gloucester Drive Franklin, MA 02038
Commercial CGX, LLC EEG headsets	7 Gloucester Drive Franklin, MA 02038
Brain Fingerprinting Laptop	7 Gloucester Drive Franklin, MA 02038

Dated this 3 of March 2022.



Thierry Maison
7 Gloucester Drive
Franklin, MA 02038